

## Buchanan Ingersoll & Rooney PC

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May 5, 2020

**Via ECF**

Hon. Edward S. Kiel, U.S.M.J.  
United States District Court  
For the District of New Jersey  
Rev. Dr. Martin Luther King, Jr. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: *Isley et al v. BMW of North America, LLC*  
Civil Action No. 2:19-cv-12680-ES-ESK  
*Status Update in Advance of May 11, 2020 Conference Call*

Dear Judge Kiel,

We represent BMW of North America, LLC (“BMW NA”) and Bayerische Motoren Werke Aktiengesellschaft (“BMW AG”). We write jointly on behalf of the parties to update the Court on the status of this matter as directed in the Court’s March 16, 2020 text order. As the Court may recall, discovery in this matter was stayed in light of mediation by Order entered on February 27, 2020 (DE 27).

The continuing disruptions posed by the COVID-19 pandemic have delayed the parties’ ability to conduct a mediation. Nonetheless, we have had several productive telephone conferences with our mediator, Hon. Jose L. Linares, U.S.D.J. (ret.), and amongst the parties. We can provide further details on our call.

Thank you for your courtesies and consideration.

Very truly yours,

*Christopher J. Dalton*

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CJD/